

**CALIFORNIA CIVIL RIGHTS LAW GROUP**

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DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and  
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES, INC.;  
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANT CITISTAFF SOLUTIONS,  
INC.'S MOTION FOR SUMMARY  
JUDGMENT**

Date: October 23, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 201

**MOTION**

Pursuant to Local Rules 7-11 and 79-5, as well as Judge Orrick's Standing Order regarding administrative motions to seal, Plaintiffs Demetric Di-az and Owen Diaz respectfully request an order sealing the physical copies in the Court's files of Exhibits A through V to the Supplemental Declaration of Lawrence Organ in Support of Plaintiffs' Opposition to Defendant Citistaff Solutions, Inc.'s Motion for Summary Judgment. This Motion is based on the Declaration of Lawrence Organ in support thereof, and the documents to be sealed are laid out below:

<b>Document</b>	<b>Designating Party</b>	<b>Basis for Sealing</b>
Exhibit A: CITISTAFF-000034-CITISTAFF000035	Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit B: CITISTAFF-000043	Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit C- NS000004	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit D: Deposition of Owen Diaz	nextSource, Inc.; Tesla, Inc.; and Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit E: TESLA-0000511	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit F: TESLA-0000510	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit G: TESLA-0000667 to TESLA-0000671	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit H: TESLA-0000314 to TESLA-0000316	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit I: Deposition of Demetric Di-Az	Tesla, Inc. and West Valley Staffing Group	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit J: Deposition of Lamar Patterson	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit K: TESLA-000060	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit L: TESLA-0000626	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit M: NS000138-NS000139	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit N: CITISTAFF-0000050-CITISTAFF-0000055	Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Exhibit O: CITISTAFF-0000004-CITISTAFF-0000005	Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit P: NS000038 – NS000045	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit Q: NS000095 - NS000100	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit R: NS000014	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit S: CITISTAFF-0000009-CITISTAFF-0000010	Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit T: TESLA-0000321	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit U: TESLA-0000001 - TESLA-0000003	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit V: NS000175 - NS000178	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Publicizing these documents would violate the Protective Order entered in this case [Dkt. No. 50].

DATED: October 2, 2019

By: /s Lawrence Organ  
 Lawrence A. Organ, Esq.  
 Navruz Avloni, Esq.  
 Attorneys for Plaintiffs  
 DEMETRIC DI-AZ AND OWEN DIAZ